

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

UNITED STATES OF AMERICA,

Plaintiff,

v.

OTIS PAMPLIN,
JOSEPH KYLE SANDERS

Defendants.

INDICTMENT

CASE NO.

Title 18, Sections
924(c)(1)(A)(i), 924(c)(1)(A)(ii),
1951(a), 2113(a) and (d), and 2,
United States Code

1:18 CR 517

COUNT 1

JUDGE PEARSON

(Attempted Armed Bank Robbery, in violation of 18 U.S.C. §§ 2113(a) and (d) and 2)

The Grand Jury charges:

1. On or about July 11, 2018, in the Northern District of Ohio, Eastern Division, Defendants OTIS PAMPLIN, JOSEPH KYLE SANDERS, and R.E., aiding and abetting one another, by force and violence, or intimidation, did attempt to take from the person or presence of bank tellers and other employees at the Ohio Savings Bank, 720 Richmond Road, Richmond Heights, Ohio, monies belonging to, or in the care, custody, control, management, or possession of said bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, did put in jeopardy the lives of bank employees and others by the use of a dangerous weapon, to wit: a firearm, in violation of Title 18, United States Code, Sections 2113(a) and (d) and 2.

COUNT 2

(Using or Carrying a Firearm During and in Relation to a Crime of Violence,
in violation of 18 U.S.C. §§ 924(c)(1)(A)(i) and 2)

The Grand Jury further charges:

2. On or about July 11, 2018, in the Northern District of Ohio, Eastern Division, Defendants OTIS PAMPLIN, JOSEPH KYLE SANDERS, and R.E., aiding and abetting one another, did use or carry a firearm, during and in relation to a crime of violence, which may be prosecuted in a court of the United States, to wit: Armed Bank Robbery, in violation of Title 18, United States Code, Sections 2113(a) and (d), as charged in Count 1 of this Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.

COUNT 3

(Interference with Commerce by Means of Robbery, in violation of 18 U.S.C. §§ 1951(a) and 2)

The Grand Jury further charges:

3. On or about July 11, 2018, in the Northern District of Ohio, Eastern Division, Defendants OTIS PAMPLIN, JOSEPH KYLE SANDERS, and R.E., aiding and abetting one another, did unlawfully obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), PAMPLIN, SANDERS, and R.E., did unlawfully take and obtain monies in the custody, possession, and presence of employees of LoanMax, located at 13216 Cedar Road, Cleveland Heights, Ohio, against said employees' will, by means of actual and threatened force, violence, and fear of immediate injury to said employees, in that PAMPLIN, SANDERS, and R.E., aiding and abetting one another, displayed and brandished a firearm in the presence of said employees, in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT 4

(Using or Carrying, and Brandishing a Firearm During and in Relation to a Crime of Violence,
in violation of 18 U.S.C. §§ 924(c)(1)(A)(ii) and 2)

The Grand Jury further charges:

4. On or about July 11, 2018, in the Northern District of Ohio, Eastern Division, Defendants OTIS PAMPLIN, JOSEPH KYLE SANDERS, and R.E., aiding and abetting one another, did use or carry a firearm, during and in relation to a crime of violence, which may be prosecuted in a court of the United States, to wit: Interference with Commerce by Means of Robbery, in violation of Title 18, United States Code, Section 1951(a), as charged in Count 4 of this Indictment, and further did brandish said firearm, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.